U. S. Department of Housing and Urban Development
Washington, D.C. 20410

OFFICE OF LEAD HAZARD CONTROL

POLICY GUIDANCE NUMBER: 94-08	DATE: November 02, 1994
SUBJECT:	Use of Niton and other Manufacturer's XRF Instruments
STATUS:	Archived
APPLICABILITY:	All grant rounds.
RELATED GUIDANCES:	
COMMENTS:	Superseded by the HUD Guidelines for the Evaluation and Control of Lead-based Paint Hazards in Housing, June 1995 and XRF Performance Characteristic Sheets. This policy guidance will be archived and no longer be referenced.

NOTE TO: Users and Manufacturers of Portable XRF Analyzers

FROM: Ronald J. Morony, Acting Director

SUBJECT: HUD Policy on New XRFs

I am sending you letter from me to Andrew Nelson, of the State of Massachusetts, describing HUD's policy on the use of new portable X-ray fluorescence analyzers for lead-in-paint inspections.

HUD and EPA are now planning to begin evaluating new XRF models this month, and we plan to continue offering this service in 1995 and 1996. Manufacturers are being contacted. We plan to make the results of the evaluations available to all interested parties on a continuing basis starting in early 1995. Chapter 7 of the new Guidelines is being revised to reflect this evaluation activity. We expect that the revised chapter will be available in February 1995, perhaps earlier.

Attachment

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[letter to Andrew Nelson, Program Manager, Commonwealth of Massachusetts]

Dear Andy:

I am writing in response to your letter to Ellis Goldman of September 29, 1994,requesting HUD approval of the use of portable NITON X-ray fluorescence (XRF) analyzers in housing that is part of your HUD-funded program but not part of the national program evaluation being coordinated by the national Center for Lead-Safe Housing. I am replying because this is a policy matter that may affect all HUD programs.

HUD recommends against using XRFs that have not been thoroughly evaluated, because, without good evaluative data, the user will not know the performance characteristics of the instruments and may make incorrect decisions that impact the safety of residents. However, despite this concern, HUD will not at this time prohibit the use of NITON or other portable XRFs that have not been evaluated by a method recognized by the Department. The exception to this policy is the national program evaluation, for which we need standard methods and consistent data, as you acknowledge.

The reason for not prohibiting the use of specific XRFs is that HUD does not want to discourage the development of new technology. The Department, along with the Environmental Protection Agency (EPA) and the National Institute of Standards and Technology (NIST), is engaged in research and development that is intended to produce a standard, nationally recognized evaluative procedure that will produce consistent and reliable data about all portable XRFs subjected to such an evaluation. We expect that an initial procedure will be available in a few months. Once such a procedure is in place, HUD may decide to impose certain performance requirements on portable XRFs.

Use of an XRF that has not been thoroughly evaluated entails certain risks to both housing occupants and users of the instruments. If such an instrument proves to be unreliable, reinspection may be necessary. Therefore HUD recommends that, before using such an instrument, users perform side-by-side comparisons of the subject instrument with a better known instrument or a proven laboratory analysis method to assure that the subject XRF performs satisfactorily on the types of paint-substrate conditions that will be encountered in

the housing to be tested. It is especially important that such comparisons be conducted on multi-layered paint with heavily leaded paint that is deeply buried, if such conditions are likely to be present, as they are in the Boston housing stock.

We appreciate your concerns and want to be responsive to the extent possible. I hope that this letter helps you in this regard.

Sincerely,

Ronald J. Morony
Acting Director